

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

THE SMITH LAW FIRM, PLLC

PLAINTIFF

VS.

Case No. 3:24-cv-564-CWR-ASH

**BEASLEY, ALLEN, CROW, METHVIN,
PORTIS AND MILES, P.C.; ANTHONY
DOW “ANDY” BIRCHFIELD, JR.; and
TED GORDON MEADOWS**

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION

Defendants Beasley, Allen, Crow, Methvin, Portis and Miles, P.C.; Anthony Dow “Andy” Burchfield; and Ted Gordon Meadows (collectively “Defendants”) respectfully request an extension of time until January 8, 2025 to respond by pleading or motion to Plaintiff’s Complaint pursuant to Fed. R. Civ. P. 12, and in support would show the following:

1. Plaintiff filed its Complaint on September 19, 2024. Defendants returned to Plaintiff an executed waiver of service of summons dated October 8, 2024, making Defendants’ answer or Rule 12 motion due no later than December 9, 2024.

2. Defendants have requested, and Plaintiff has agreed to, a 30-day extension to allow Defendants additional time to investigate Plaintiff’s claims and prepare a response, which would make Defendants’ answer or Rule 12 motion due no later than January 8, 2025.

3. The requested extension is not sought for the purpose of undue delay and will not unfairly prejudice any party.

ACCORDINGLY, Defendants request that they be granted an extension of time until January 8, 2025 to respond by pleading or Rule 12 motion to Plaintiff’s Complaint.

Dated: October 31, 2024.

Respectfully submitted,

**BEASLEY, ALLEN, CROW, METHVIN,
PORTIS AND MILES, P.C.; ANTHONY
DOW “ANDY” BIRCHFIELD, JR.; and
TED GORDON MEADOWS**

By: /s/ M. Patrick McDowell

M. Patrick McDowell,
One of Their Attorneys

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Dated: October 31, 2024.

/s/ M. Patrick McDowell

M. Patrick McDowell